



National Policy For Ending Violence Against Women & Girls
(Recommendations by Digital Rights Foundation)

About Us

Digital Rights Foundation (DRF) is a women-led, not-for-profit organization working since 2013 to advance digital rights and online freedoms across South Asia and the broader Global Majority. We advocate for inclusive, rights-respecting digital spaces by driving policy change through strategic engagement with relevant stakeholders. Our work focuses on making digital platforms and emerging technologies more equitable, accessible, and accountable. At the grassroots level, we empower individuals, particularly women, marginalized communities, and human rights defenders, with the tools and knowledge to navigate the Internet safely and assert their rights online.

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**NATIONAL POLICY FOR ENDING VIOLENCE AGAINST WOMEN & GIRLS
(RECOMMENDATIONS BY DIGITAL RIGHTS FOUNDATION)**

Violence against women and girls remains one of Pakistan's most deeply rooted and unaddressed human rights crises. Digital Right Foundation (DRF) welcomes the development of the National Policy for Ending Violence Against Women and Girls (VAWG) ("Draft Policy") as a necessary step to address this challenge through a structured framework around pillars of Prevention, Response, System Strengthening, and Data and Monitoring.

The DRF recognises the Ministry of Human Rights' commitment to address this issue, particularly given the rapid technological shifts that have opened new and largely unregulated spaces for abuse against women and girls. According to the DRF's [Digital Security Helpline Annual Report 2025](#), 3,012 new cases in 2025 were received, of which 1709 complaints were reported by women, which further reflects the scale of this challenge on the ground.

DRF also acknowledges the consultative process for the Draft Policy, including provincial consultations across all four provinces, and recognises the openness to external feedback. DRF also attended the national consultation held in Islamabad on 22 June 2026 and, having identified critical gaps in the Draft Policy, particularly around digital rights and technology facilitated gender based violence (TFGBV), submits the following recommendations. These recommendations are grounded in human rights standards, regulatory trends, and over a decade of DRF's direct experience working with survivors of gender based violence in Pakistan, and to ensure the policy delivers meaningful and comprehensive protection for women and girls.

Key Concerns and Gaps in the Draft Policy:

1. The Draft Policy acknowledges TFGBV as a form of VAWG. It made references to *“evolving forms of violence such as online abuse, including doxing, forced pornography and sophisticated doctoring of images”* under Section 3.2.1, and also to *“technology-facilitated exploitation”* as a system-strengthening outcome under Section 3.3.3. It further refers to the relevant cybercrime legislative framework, the Prevention of

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Electronic Crimes Act, 2016 (PECA), in the framework section under 2.2. However, despite these mentions, the Draft Policy does not establish a dedicated mechanism to address TFGBV in a structured policy framework. While forms of violence such as “*blackmail (including through use of new media)*” are listed under section 1.2 and broader outcomes are mentioned under section 3.3.3, there is no detailed linkage to specific prevention, response, or system-strengthening actions.

2. In addition to the above, the Draft Policy also does not assign responsibility to the National Cyber Crime Investigation Agency (NCCIA), a designated agency under PECA, for cyber violence response. This is a key gap given how deepfakes and non-consensual image sharing have increased after the excessive use of AI, which requires strong and dedicated policy-level responses. For instance, over the past two years of [2024](#) and [2025](#), the DRF’s Digital Security Helpline has received more than 70 cases involving AI-generated or manipulated content, largely affecting women, which reflects the growing misuse of generative AI for online abuse. Sextortion complaints are also increasingly driven by AI-enabled blackmail, with perpetrators threatening to use original photos to create fabricated explicit content to cause fear and coercion.
3. While the policy discusses medico-legal evidence gaps in physical violence cases, as under section 3.2, and pushes for provincial action plans for resolving MLS shortages and capacity constraints, it does not similarly address digital evidence issues in cases of online violence. There are no clear provisions in the Draft Policy for digital forensics capacity, chain-of-custody protocols for digital evidence, training of investigators in handling device-based or social media evidence, and standards for securely preserving digital evidence in a trauma-informed and privacy-protective manner. The Draft Policy also does not discuss the specific vulnerabilities survivors of TFGBV face during reporting, including the risk of further exposure in image-based abuse cases and re-identification risks in doxing cases if data is not securely handled. This gap can contribute to low conviction rates in TFGBV cases, compounding it with the broader impunity problem mentioned under Section 3.3.1.

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4. The data collection under Section 3.4 of the Draft Policy for monitoring and reporting lacks a proper data privacy, confidentiality, and consent framework. In the absence of a comprehensive data protection law in Pakistan, survivor information remains vulnerable to unauthorized access, misuse, and data breaches. While this Section does refer to secure standardised data collection for protecting vulnerable groups, rehabilitating survivors, and tracking trends for national and international reporting, the absence of explicit detailed protocols for access controls, consent mechanisms, or security requirements can leave risks to the confidentiality and security of information. Also, such misuse or breaches could further expose survivors to risk.
5. The Draft Policy lacks provisions regarding the accountability of social media platforms in enabling or amplifying violence. The legislative framework lists PECA 2016, but no clear dedicated link with response or prevention action was developed. There is no reference to content moderation obligations, platform-level grievance redressal, engagement with platform companies on reporting mechanisms for non-consensual intimate image sharing, or the regulatory role of authority under PECA.
6. The policy accurately identifies low reporting, stigma, family pressure, and victim blaming as primary barriers but proposes no legal mechanism to overcome them. Every proposed action directs survivors toward formal institutions that the policy itself acknowledges are distrusted and inaccessible, which may ultimately leave no legally grounded alternative.
7. The Draft Policy under section 3.2.1 acknowledges that women face significant barriers in registering First Information Reports (FIRs), including obstruction by police officers, demands for bribes, and coercion into signing compromise deeds (razinamas). However, despite identifying these as persistent and systemic failures, the Draft Policy does not propose any dedicated legal complaints mechanism to hold such officers accountable.
8. The response framework in Section 3.2.3 is structured entirely around institutional processes such as FIR registration, medico-legal examination, prosecution, and adjudication. While these processes are essential, the Draft Policy does not refer to the recognized standard of trauma-informed care as the foundational approach that must govern how every first responder, including police officers, Investigation officers,

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medico-legal officers, shelter workers, and prosecutors, engages with a survivor of violence.

9. The policy acknowledges that most survivors cannot approach a police station due to family pressure, stigma, and institutional mistrust, yet proposes no alternative pathway. A woman who cannot leave her home due to family surveillance, who lives with her perpetrator, who fears being seen entering a police station, or who belongs to a community where approaching law enforcement carries irreversible social consequences, is offered no alternative pathway. While the Draft Policy does mention helplines, practical barriers, including weak internet connectivity, low mobile signals, limited smartphone access, low digital literacy, and the risk of a monitored phone, can limit their reach, particularly in rural parts of Balochistan, Punjab, and interior Sindh.
10. The entire prevention framework in the Draft Policy addresses men only through behavior change programs. There is no consideration of legal deterrence, such as mandatory perpetrator counseling as a court-ordered sentence, or civil protection orders that include rehabilitation requirements.
11. The policy's prevention actions provided under section 3.1.2 include public messaging on ending impunity, which is a welcome step. Awareness campaigns alone cannot shift entrenched social norms if perpetrators continue to act without consequence and communities never witness accountability in action.

Recommendations:

- The Draft Policy should establish a dedicated institutional framework for addressing TFGBV, including clearly defined prevention, response, protection, and system-strengthening measures. It should designate NCCIA as the agency for cyber violence response and provide clear coordination mechanisms with provincial police, legal aid services, shelters, and other relevant stakeholders.
- The Draft Policy refers to the establishment of a dedicated cyber wing, the Federal Investigation Agency (FIA), in Objective 3 under 3.3 as part of its system-strengthening efforts. However, this appears to be a stakeholder recommendation from the KPK Commission on the Status of Women, and its status within the policy is unclear (written in red). If it is intended as a recommendation, it is supported and should be incorporated into the policy's broader framework, noting that the institutional landscape has been changed, the FIA has been replaced by the NCCIA under the PECA (Amendment) Act, 2025, and the policy should reflect this accordingly. Also, the Draft Policy should specifically address emerging forms of TFGBV, such as deepfakes, non-consensual image sharing, and other AI-enabled harms, through targeted interventions, capacity-building measures, and survivor-centred response protocols.
- A trauma-informed, privacy-protective, and confidential digital reporting protocol should be developed to address the vulnerabilities of survivors in TFGBV. This should include digital forensics capacity-building, chain-of-custody standards, evidence preservation protocols, specialised training for investigators, secure evidence submission mechanisms, and strict prohibitions on the re-circulation or disclosure of sensitive digital material by any official during investigation or prosecution. Trauma-informed care protocols should be enacted as binding standard operating procedures applicable to police officers, NCCIA officers, medico-legal officers, shelter staff, and prosecutors, with compliance monitored through annual assessments by the Commission on the Status of Women, and digital evidence failures should be explicitly treated as accountability failures under the impunity of the Draft Policy.

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- The Draft Policy advocates for the immediate passing of the Data Protection Law and pushes to develop interim VAWG-specific data protection guidelines for research and monitoring purposes, which cover access controls, security standards, survivors' rights to access their records, and sanctions for unauthorized disclosure until comprehensive data protection legislation is enacted.
- The Draft Policy should include a specific provision requiring the PECA authority and the Ministry of IT to develop and enforce a platform accountability framework. This framework should set obligations for social media companies to address online gender-based violence, including defined timelines for the removal of non-consensual intimate images, harassment-related content, and other harmful online material.
- Under the Response objective, the Draft Policy should also address access barriers to helplines and complaint mechanisms, with an emphasis on rural areas for better survivor-centred and accessible reporting systems. It should also advocate for non-digital options such as toll-free voice calls from landlines and phones, anonymous reporting, introduce SMS/offline reporting channels, and expand the availability of police stations and NCCIA centres as part of survivor support services.
- The Draft Policy should establish a dedicated misconduct complaint mechanism under the relevant provincial police acts, allowing survivors to lodge complaints against officers directly with the Commission on the Status of Women or an independent oversight body, bypassing the police chain of command entirely.
- The Draft Policy should allow some exceptions permitting third parties such as Lady Health Workers or community workers, or any other trusted person chosen by the survivor to initiate a complaint on her behalf, and that a simple SMS or online complaint channel be made available so that a survivor can reach out for help without being required to physically appear before any institution at the initial stage.

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- The Draft Policy should introduce perpetrator counselling as a court-ordered sentencing option in domestic violence cases, running alongside rather than replacing custodial sentences, and that civil protection orders be amended under provincial women's protection acts to include mandatory rehabilitation requirements, with compliance monitored by the court.
- The Draft Policy should ensure that GBV and TFGBV case convictions are actively pursued and the landmark cases are systematically communicated through broadcast and digital media, without disclosing any information that could identify the survivor, so that communities can see the law functioning in practice and the perpetrators face real consequences.
- Under the Introduction (Section 1), the Draft Policy refers to Pakistan's obligations under international human rights instruments such as the ICCPR, CEDAW, and CAT to protect women from discrimination and violence. However, there are also other international treaties and conventions which provide relevant protections against discrimination and gender-based violence, including the ICESCR (such as Articles 2 and 3), and the UNCRC (including Articles 2 and 37(a)). It is therefore recommended that the policy adopt broader language, such as "international human rights conventions, including but not limited to," followed by key instruments including the ICCPR, CEDAW, CAT, ICESCR, and UNCRC, among others. This would help reflect the full scope of Pakistan's international commitments, along with corresponding obligations and accountability.

Note: See Annexure A (below) for spelling mistakes and editorial errors.

Annexure A

The following are some spelling mistakes and editorial errors throughout the Draft Policy that may affect the intended meaning. For instance;

- In the introduction under Section 1, the reference to “Article 25A” is incorrect. The excerpt cited is actually from Article 25(2) of the Constitution of the Islamic Republic of Pakistan, 1973. Additionally, the provision that authorizes the state to make special provisions for the protection of women and children falls under Article 25(3) of the Constitution, not Article 25-A
- Under 1.4, the phrase “*the span of N National Policy I will be used to conduct the groundwork for National Policy II*” should be corrected to “*the span of National Policy I will be used to conduct the groundwork for National Policy II*”
- Under 2.3 in the National Gender Policy Framework prevention column, the word “*masculinities*” is misspelled as “*masculnities*”
- Under the heading “Improve Perceptions of and Trust in the Criminal Justice System” in 3.1.1, the phrase “*the unconducive environment of of institutions*” should be corrected to “*the unconducive environment of institutions.*”